

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHEAST DIVISION

RECEIVED  
2007 JUL 25 A 9:19

THOMAS OTTER ADAMS.

PRO SE - PLAINTIFF

VS.

EWINGOLYN MOSLEY,  
WARDEN III, ET. AL.

DEFENDANT(S)

CIVIL ACTION

2:06-CV-0873, ID-CSC

SUPPLEMENTAL RESPONSE TO DEFENDANT'S SPECIAL REPORT

COMES NOW THE PLAINTIFF, THOMAS OTTER ADAMS, A STATE PRISONER, WHO IS BEFORE THIS HONORABLE COURT, CHIEF UNITED STATES MAGISTRATE JUDGE, MR. CHARLES S. COODY.

PURSUANT TO THIS HONORABLE COURT'S ORDER OF JULY 16, 2007 AND THE ORDER OF JUNE 14, 2007, THIS PLAINTIFF FILES THE FOLLOWING,

IN THE SUPPORT WHEREOF;

LEGAL USE ONLY

I AM THOMAS ADAMS, A STATE PRISONER, PLAINTIFF IN THE ABOVE CIVIL ACTION. I AM OVER 21 YEARS OLD.

PLAINTIFF ASSENTS AND RECALLES EACH AND EVERY ALLEGATION OF THE ORIGINAL COMPLAINT AS IF WHOLLY STATED HERE.

PLAINTIFF MAINTAINS, AS IT COMPLETELY RESTATED HERE THE ENTIRE "RESPONSE TO DEFENDANT'S - SPECIAL REPORT", FILED DECEMBER 11, 2006.

PLAINTIFF ASSENTS AT THIS TIME, THAT IN JUNE 26, 2007, WHILE INSPECTING THE MEDICAL FILE OF THIS PLAINTIFF / PRISONER THAT THE FOLLOWING DOCUMENT(S), PAPER(S), REPORT(S) WERE DISCOVERED.

- #1 - INCIDENT REPORT OF 8-10-2006 @ 9:25 AM A.D.D.C. FORM 302-A, (AND CONTINUATIONS)
- #2 - INVESTIGATION SHEET - USE OF FORCE ATTACHMENT # 1 - S.O.P. C-28
- #3 - BODY CHART REPORT - 8-10-2006 @ 12:00 PM A.D.D.C. FORM 302-C (6-1-2005)
- #4 - LETTER FROM LATTICE GREEN TO WARDEN'S MOSLEY AND DAVENPORT, (10-20-2006).
- #5 - EMERGENCY REPORT FROM NURSE BOSH - (PHS) @ 9:45 AM - SUBJECT: CO1 JOEL TEW.
- #6 - BODY CHART (PHS) - NURSE COWMAN @ 4:15 PM 8-10-2006, SUBJECT: THOMAS ADAMS - # 100612
- #7 - 8-11-2006, SPECIAL NEEDS COMMUNICATION FORM. DR. J. DARBUSE (PHS) @ 9:40 AM
- #8 - 8-11-06., RECEIPT OF MEDICAL EQUIPMENT / APPLIANCE FORM - WRIST-BRADE
- #9 - SPECIAL NEEDS COMMUNICATION, FORM @ 4:35 PM.

(1)

Plaintiff maintains that there are no provisions in the A.D.C.'s ADMINISTRATIVE REGULATION # 023, "REQUEST AND RELEASE OF A.D.C. DOCUMENTS" for the procurement of "EVIDENTIARY MATERIALS" by an indigent prisoner. WHILE A PRISONER OF MEANS. (I.E. A WETHEAF PEDDLE or A KINE-PIN DRIVE DEALER) CAN OBTAIN THESE SAME SERVICES AT THE RATE OF .50 (FIFTY CENTS) PER PAGE!

Plaintiff asserts that, WITHOUT THIS HONORABLE COURT'S JUDICIAL INSPECTION OF THESE (9) NINE ITEMS FROM PLAINTIFF'S MEDICAL FILE, HE IS PLACED AT A SERIOUS LEGAL DISADVANTAGE.

Plaintiff asserts and alleges that DUE ENTIRELY TO THE ACTIONS OF DEFENDANT CO 1 JAIL TOW, I WAS ORDERED AND REQUIRED TO WEAR A WRIST BRACE FOR TWO WEEKS, THE ABUSE AND EXCESSIVE FORCE OF CO 1 JAIL TOW HAS AND CONTINUES TO CAUSE PERMANENT PAIN AND SURPRINE TO THIS PRISONER'S RIGHT HAND AND FOREARM. THIS PLAINTIFF IS RIGHT-HANDED, EACH LEGAL DOCUMENT IS HAND-WRITTEN RIGHT HANDED.

Plaintiff further asserts that the defendant SECREATION COMMANDER SET. C. NOLET WAS REMOVED FROM ASSIGNMENT TO THE SEC. UNIT. AND HAS SINCE BEEN TRANSFERRED DUE TO REWRITTEN WRONES/ MISCONDUCT(S) AS AN A.D.C. EMPLOYEE. WHICH PRESENTS A QUESTION OF UNRELIABILITY AND/or A FRAUDULENT AFFIDAVIT. AS IS ALLEGED IN THE ORIGINAL "REQUEST". FILED DECEMBER 11, 2006.

RELIEF REQUESTED

PLAINTIFF PRAYS THAT THIS HONORABLE COURT  
TO ISSUE;

A POSITIVE AWARD AGAINST THE DEFENDANTS  
IN THE AMOUNT OF \$5,000.00, FIVE THOUSAND DOLLARS.

A DECLARATORY JUDGMENT AGAINST THE DEFENDANTS  
IN THE AMOUNT OF \$5,000.00, FIVE THOUSAND DOLLARS.

TO ISSUE A SUMMARY JUDGMENT FOR  
THIS PLAINTIFF, AGAINST THE ALABAMA DEPARTMENT  
OF CORRECTIONS AND THE NAMED DEFENDANTS, WHO  
ARE EMPLOYEES OF THE SAME, WHILE IN THEIR  
OFFICIAL AND INDIVIDUAL CAPACITIES.

TO ORDER THE A.D.O.C. AT BASTROP TO  
CONTINUE AND MAINTAIN AND AND ALL MEDICAL  
TREATMENTS RELEVANT TO THIS INCIDENT.

TO ORDER THE INVESTIGATION & INTELLIGENCE  
DIVISION OF THE A.D.O.C. TO PROVIDE DOCUMENTARY  
EVIDENCE, INCLUDING POLYGRAPH RESULTS, OF THIS  
INCIDENT ON AUGUST 10, 2006.

RESPECTFULLY SUBMITTED.

Thomas Adams

THOMAS ADAMS - 100612  
B-34 - SEC. UNIT. E.C.T.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, BY MY SIGNATURE, THAT  
I HAVE MAILED A TRUE COPY OF, 'PLAINTIFF'S  
SUPPLEMENTAL RESPONSE TO DEFENDANT'S SPECIAL REPORT'  
FIRST-CLASS POSTAGE PRE-PAID AND PROPERLY  
ADDRESSED TO:

MS. BETTIE GRAMACK, ATTORNEY  
ATTORNEY GENERAL'S OFFICE  
# 11 SOUTH UNION STREET  
MONTGOMERY, ALA. 36130-8152

DONE THIS 23RD DAY OF JULY, 2007, BY PLACING  
THE SAME IN THE CELL DOOR OF B-34.

THE ABOVE AND FOREGOING IS TRUE AND  
CORRECT TO THE BEST OF MY BELIEF AND KNOWLEDGE,  
PURSUANT TO THE PENALTIES OF PERJURY.

RESPECTFULLY SUBMITTED,  
Thomas Adams

THOMAS ADAMS - 180612  
B-34, SEC. UNIT. E.C.F.  
280 WALLACE DRIVE  
CLIO, ALABAMA 36017

CC: U.S. DIST. COURT  
ASSISTANT ATTORNEY GENERAL  
INMATE FILE.

PA. 1284 711

36181-B711

patient mail privilege

6007

[illegible]